

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 3:20-CR-20587

-VS-

Hon. Matthew F. Leitman

BRANDON JOHNSON,

Defendant.

_____ /

**UNOPPOSED MOTION FOR LEAVE TO FILE GOVERNMENT'S
SENTENCING SUBMISSION UNDER SEAL**

The United States of America, by and through the undersigned counsel, respectfully moves for leave to file its sentencing submission under seal. The reason for this request is that the Government's sentencing submission details pertinent facts concerning grounds for departure under Chapter Five of the United States Sentencing Guidelines.

Pursuant to Local Rule 7.1, the undersigned has conferred with defense counsel and the defendant does not oppose the requested relief. A proposed order will be submitted by means of the ECF utility.

Dated: March 5, 2024

Respectfully submitted,

DAVID A. HUBBERT
Deputy Assistant Attorney General
United States Department of Justice-Tax Division

By: /s/ Jeffrey A. McLellan

Jeffrey A. McLellan

Trial Attorney

Tax Division, Northern Criminal Enforcement

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CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2024, this document will be transmitted to counsel for Brandon Johnson by the ECF system.

/s/ Jeffrey A. McLellan

Jeffrey A. McLellan

Trial Attorney

U.S. Department of Justice, Tax Division